

**REMARKS/ARGUMENTS**

Claims 1-10 and 12-14 are pending. Claim 11 has been canceled without prejudice. Claims 1-10 and 12-14 have been amended. No new matter has been introduced. Applicants believe the claims comply with 35 U.S.C. § 112.

Applicants note with appreciation the indicated allowance of original claims 3-6 and 9-14. These claims have been amended to correct minor informalities. Applicants believe claims 3-6, 9, 10, and 12-14 are still allowable.

Claims 1 and 2 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Humlicek (USP 6,332,177).

Applicants respectfully submit that independent claim 1 as amended is novel and patentable over Humlicek because, for instance, Humlicek does not teach or suggest reading data of  $m-1$  units from the first group of  $n$  disk devices, and forming redundant data, and storing each data of  $m-1$  units and the redundant data in any one of the  $m$  disk devices of the second group. Humlicek discloses that  $N$  copies of data are respectively and differently stored into  $M$  devices, wherein  $M \geq N$  (see Abstract and Tables 1-6). Nothing in Humlicek teaches or suggests the elements of claim 1.

For at least the foregoing reasons, claim 1 and claim 2 depending therefrom are novel and patentable.

Claims 7 and 8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Humlicek and Schatzberg (USP 6,615,284).

Applicants respectfully assert that independent claim 7 as amended is patentable over Humlicek and Schatzberg because, for instance, they do not disclose or suggest that data of  $n-1$  units and redundant data generated from the data of  $n-1$  units are stored in the first group of  $n$  disk devices, and that data of  $m-1$  units and redundant data generated from the data of  $m-1$  units are stored in the second group of  $m$  disk devices. Nor do they suggest that the controller reads data from the first group of  $n$  disk devices, generates new redundant data to be stored in the  $m$  disk devices corresponding to the read data, and stores the read data and the new redundant data into the second group of  $m$  disk devices.

Humlicek discloses storing N copies of data respectively and differently into M devices, and fails to teach the elements of claim 7. Schatzberg does not cure the deficiencies of Humlicek, but merely discloses that data are stored into a plurality of storage devices each of which is connected to a separate bus, and that when an access request is input, the access request is dispersed to the plurality of storage devices (see Abstract).

For at least the foregoing reasons, claim 7 and claim 8 depending therefrom are patentable.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,



Chun-Pok Leung  
Reg. No. 41,405

TOWNSEND and TOWNSEND and CREW LLP  
Two Embarcadero Center, Eighth Floor  
San Francisco, California 94111-3834  
Tel: 650-326-2400  
Fax: 415-576-0300  
RL:rl  
60192195 v1